

January 14, 2025

BY ECF

The Honorable John P. Cronan
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *Doe v. Combs, et. al.*, Case No. 24-cv-08852 (JPC)

Dear Judge Cronan:

We write jointly on behalf of the Plaintiff in this action and defendants Sean Combs, Daddy’s House Recordings Inc., CEOpCo, LLC d/b/a Combs Global f/k/a Combs Enterprises, LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Bad Boy Entertainment LLC, and Bad Boy Productions LLC (the “Combs Defendants”) and defendant Bad Boy Records, LLC.

The undersigned parties have agreed that the Combs Defendants and Bad Boy Records, LLC will accept service through the undersigned counsel of (1) the Complaint (ECF #1) and (2) the Plaintiff’s Second Motion for Leave to Appear Anonymously (ECF #14, the “Second Anonymity Motion”) in exchange for Plaintiff’s consent to an extension of time to respond to each until **March 4, 2025**.

Consistent with this agreement, the undersigned parties respectfully request that the Court enter a scheduling order providing that (1) the Combs Defendants and Bad Boy Records, LLC shall have until **March 4, 2025** to answer, move, or otherwise respond to the Complaint; and (2) the Combs Defendants and Bad Boy Records, LLC shall have until **March 4, 2025** to file an opposition to the Second Anonymity Motion. No prior request for this relief has been made.

Respectfully submitted,

/s/ Mark Cuccaro

Mark Cuccaro
SHER TREMONTE LLP
90 Broad Street, 23rd Fl.
New York, New York 10004
T: 212.202.2600
mcuccaro@shertremonte.com
Counsel for the Combs Defendants

/s/ Antigone Curis

Antigone Curis
CURIS LAW, PLLC
52 Duane Street, 7th Fl.
New York, NY 10007
(646) 335-7220
antigone@curislaw.com
Counsel for Plaintiff John Doe

Hon. John P. Cronan

January 14, 2025

Page 2 of 2

/s/ Donald S. Zakarin

Donald S. Zakarin

PRYOR CASHMAN, LLP

7 Times Square

New York, NY 10036

212-326-0108

dzakarin@pryorcashman.com

Counsel for Defendant Bad Boy

Records, LLC

The parties' proposed schedule is adopted. Defendants shall respond to the Complaint by March 4, 2025. Defendants' deadline to respond to Plaintiff's second motion for leave to appear anonymously, Dkts. 14-17, is extended to March 4, 2025. By January 31, 2025, Plaintiff shall file on the docket proof of service on all Defendants. The Clerk of Court is respectfully directed to close Docket Number 18.

SO ORDERED.

Date: January 14, 2025

New York, New York



JOHN P. CRONAN

United States District Judge